

EXHIBIT C

Ronald G. Harris

From: Katherine Barrett Riley <KBRiley@BarrettLawGroup.com>
Sent: Friday, June 7, 2024 9:13 AM
To: Nanci-Taylor Maddux; Leet, Byron; Matt Pietsch; Alan S. Bean; Ronald G. Harris
Cc: Loofbourrow, Ryan; Gino Marchetti; Olivia R. Arboneaux; Philip N. Elbert; Bradshaw, Jimmy; Travis, Tom; Carpenter, Brigid; Jjacobson@rjfirm.com; Kklein@rjfirm.com; Mintz@mintzandgold.com; McCormick@mintzandgold.com; Ariana C. Voegler; Michelle Byerly; Cathy Pudlo; brody@mintzandgold.com; otchy@mintzandgold.com; klein@mintzandgold.com; Sills Litigation
Subject: RE: Sills, et al. v. Southern Baptist Convention, et al.; 3:23-cv-00478

Dear Counsel:

Several of you have reached out and left messages for extensions of time on your discovery responses. We have been surprised by this, given the positions taken in the recent meet and confer concerning amendment to the CMO. Now the CMO has been entered barely two weeks, and we are concerned your extensions will create new issues with respect to our preparations for depositions. Defendants have a couple depositions to take, but Plaintiffs have a dozen or more. The extensions are not easily accommodated given the deadlines you required. Please send in writing your specific request and indicate the reason for needing an extension. I will take it back to our team, who has concerns about the several requests.

Sincerely,
Katherine

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From: Nanci-Taylor Maddux <NTMaddux@BarrettLawGroup.com>
Sent: Wednesday, May 8, 2024 3:36 PM
To: Katherine Barrett Riley <KBRiley@BarrettLawGroup.com>; Leet, Byron <bleet@wyattfirm.com>; Matt Pietsch <matt@tpmblaw.com>; Alan S. Bean <ABean@starneslaw.com>; Ronald G. Harris <rharris@nealharwell.com>
Cc: Loofbourrow, Ryan <rloofbourrow@bakerdonelson.com>; Gino Marchetti <gmarchetti@tpmblaw.com>; Olivia R. Arboneaux <oarboneaux@nealharwell.com>; Philip N. Elbert <pelbert@nealharwell.com>; Bradshaw, Jimmy <jbradshaw@wyattfirm.com>; Travis, Tom <TTRAVIS@wyattfirm.com>; Carpenter, Brigid <bcarpenter@bakerdonelson.com>; Jjacobson@rjfirm.com; Kklein@rjfirm.com; Mintz@mintzandgold.com; McCormick@mintzandgold.com; Ariana C. Voegler <avoegler@nealharwell.com>; Michelle Byerly <mbyerly@nealharwell.com>; Cathy Pudlo <cpudlo@nealharwell.com>; brody@mintzandgold.com; otchy@mintzandgold.com; klein@mintzandgold.com; Sills Litigation <sillslitigation@barrettlawgroup.com>
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Missed attachment so adding it here